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November 16, 2024

VIA ECF

The Honorable John R. Tunheim
United States District Judge
300 South Fourth Street
Minneapolis, MN 55415

Re: United States v. Steve Shand
Case No.: 22-cr-40

Dear Judge Tunheim:

Counsel for Steve Shand has reviewed the Government's November 15, 2024, correspondence to the Court (ECF #164) regarding Count 4 of the second superseding indictment. Assuming Counsel is correctly reading the Government's letter, Mr. Shand agrees with the Government's position. Namely, that Count 4 is properly charged, that the maximum sentencing exposure is five years, and the financial gain enhancement will be presented as an element of the offense.

If you have any questions, please do not hesitate to contact me.

Sincerely,

s/ Aaron Morrison

Aaron Morrison
Assistant Federal Defender

AM/sls